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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL,

Petitioners,

vs.

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715,

Respondent.

Case No: 5:07-CV-05158-JF

[PROPOSED] ORDER GRANTING  
STANFORD HOSPITAL AND  
CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION  
TO COMPEL RESPONSES TO  
DISCOVERY SUBPOENA  
PROPOUNDED TO UHW

Date: August 27, 2008  
Time: 9:30 A.M.  
Dept: Courtroom 4, 5th Floor

Judge: Hon. Jeremy Fogel  
Magis. Judge: Hon. Richard Seeborg

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner and Counter-  
Respondent,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents and Counter-  
Petitioners.

Case No: 5:08-CV-00213-JF

Judge: Hon. Jeremy Fogel

[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
PROPOUNDED TO UHW

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00215-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-00216-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01726-JF

Judge: Hon. Jeremy Fogel

SERVICE EMPLOYEES  
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and  
LUCILE PACKARD CHILDREN'S  
HOSPITAL

Respondents.

Case No: 5:08-CV-01727-JF

Judge: Hon. Jeremy Fogel

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[PROPOSED] ORDER GRANTING STANFORD HOSPITAL AND CLINICS AND LUCILE PACKARD  
CHILDREN'S HOSPITALS' MOTION TO COMPEL RESPONSES TO DISCOVERY SUBPOENA  
PROPOUNDED TO UHW

CASE NOS. 5:07-CV-05158-JF, 5:08-CV-00213-JF, 5:08-CV-00215-JF;  
5:08-CV-00216-JF; 5:08-CV-01726-JF; 5:08-CV-01727-JF

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2 The Motion to Compel Responses To Discovery Subpoena Propounded To UHW  
3 (the "Motion") brought by Stanford Hospital And Clinics and Lucile Packard Children's  
4 Hospital (the "Hospitals"), in the above-referenced related cases came on for hearing  
5 before the above-captioned Court, the Honorable Richard Seeborg presiding, on  
6 \_\_\_\_\_, 2008.

7 The Court, having considered the pleadings in this matter, and all papers submitted  
8 in support of, and in opposition to, said motion, and having heard the argument of  
9 counsel, and good cause appearing therefor, hereby **GRANTS** the Motion in its entirety.

10 Service Employees International Union, United Healthcare Workers - West  
11 ("UHW") shall provide full and complete responses to the subpoenas propounded upon it  
12 by the Hospitals in the above-referenced cases. UHW's responses shall include  
13 electronically stored information that is responsive to the subpoenas, including website-  
14 related information. Any withholding of responsive information on the basis of a  
15 privilege or work product protection shall be supported by a privilege log that identifies  
16 the documents withheld on a document by document basis, including the following  
17 information:

- 18 1) the Bates number of the document;
- 19 2) the date of the document;
- 20 3) the specific individual author/s of the document;
- 21 4) the specific individual recipient/s of the document;
- 22 5) a precise document description;
- 23 6) the specific privilege/s claimed; and
- 24 7) the present location of the document.

25 UHW shall not withhold responsive information not subject to a privilege or work  
26 product protection.

27 UHW is ordered to serve responsive documents on or before the tenth business

1 day following the date of this order.

2 It is further ordered that UHW shall pay the Hospitals' reasonable expenses  
3 incurred in making this motion, including attorneys fees, in the amount of  
4 \$\_\_\_\_\_.

5 IT IS SO ORDERED.

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7 Dated:

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HON. RICHARD SEEBORG  
MAGISTRATE JUDGE OF THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
CALIFORNIA, SAN JOSE DIVISION